

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

BRIAN K. REINBOLD,

Plaintiff,

Case No. 04-342 (GMS)

- vs. -

NATIONAL ASSOCIATION OF LETTER
CARRIERS BRANCH 1977,

Defendants.

BRIAN K. REINBOLD,

Plaintiff,

Case No. 05-047 (GMS)

- against -

UNITED STATES POSTAL SERVICE and
NATIONAL ASSOCIATION OF LETTER
CARRIERS BRANCH 191,

Defendant.

**JOINT MOTION TO EXTEND DISCOVERY AND TO EXTEND THE SUMMARY
JUDGMENT DEADLINE OF DEFENDANTS NATIONAL ASSOCIATION OF
LETTER CARRIERS BRANCH 1977 AND BRANCH 191 AND UNITED STATES
POSTAL SERVICE**

As detailed in the accompanying reply memorandum of law and the entire record, defendants National Association of Letter Carriers Branch 1977 and Branch 191 (the “Union Defendants”) and United States Postal Service jointly move this Court to extend discovery 60 days from the entry of a decision on the Union Defendants’ pending Motion to Dismiss and to

extend the summary judgment deadline, currently set for November 30, 2005, 30 days beyond the newly ordered close of discovery.

No party to this action has requested an extension of discovery or an extension of the summary judgment deadline prior to this request, and no such extensions have been granted prior to this request.

Dated: November 22, 2005

/s/ Susan E. Kaufman

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/s/ Patricia Hannigan

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*Attorney for Defendant United States
Postal Service*

CERTIFICATION

I hereby certify, pursuant to Local Rule 16.5 that I have sent a copy of the foregoing request for an extension of time to my clients, National Association of Letter Carriers Branch 1977 and Branch 191.

/s/Oriana Vigliotti

Oriana Vigliotti

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Defendant.

CERTIFICATE OF SERVICE

I hereby certify that on November 22, 2005, the foregoing Joint Motion to Extend Discovery and to Extend the Summary Judgment Deadline of Defendants National Association of Letter Carriers Branch 1977 and Branch 191 and United States Postal Service and this Certificate of Service were filed electronically with the Clerk of the Court to be served by operation of the Court's electronic filing system upon Patricia Hannigan, Assistant United States

Attorney, 700 Orange Street, Suite 700, Wilmington, Delaware 19899, Counsel for Defendant
United States Postal Service.

I hereby certify that on November 22, 2005, the foregoing was mailed by first-class mail to the following non-participant in Electronic Case Filing:

Plaintiff
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Date: November 22, 2005